

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID STEINER, and	)	
STEINER ASSOCIATES, LLC,	)	
	)	
Plaintiffs,	)	Civil Action No. 21-CV-11181-PBS
	)	
v.	)	
	)	
EBAY INC., et al.,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE  
TO THE GOVERNMENT'S MOTION FOR A PROTECTIVE ORDER**

Defendants eBay Inc., Progressive F.O.R.C.E. Concepts, LLC, Devin Wenig, Steve Wymer, Jim Baugh, David Harville, Brian Gilbert, Philip Cooke, Stephanie Popp, Stephanie Stockwell, Veronica Zea, Wendy Jones, and Steve Krystek (the "Defendants") jointly move to extend the deadline one week, up to and including November 7, 2023, for the parties to file their responses to the government's motion for a protective order. In support of this motion, the Defendants state as follows:

1. On October 17, 2023, the government submitted a motion for a protective order along with a proposed protective order. *See* Dkt. Nos. 273 and 273-2.
2. Under Local Rule 7.1(b)(2), the deadline to file an opposition to the government's motion is October 31, 2023.
3. The Defendants and the government are in discussions concerning whether they can reach agreement as to the scope and breadth of the protective order.
4. A one-week extension up to and including November 7, 2023 would allow the numerous defendants in this case to coordinate their responses to the government's motion and

avoid duplicative arguments and filings.

WHEREFORE, the Defendants respectfully move this Court to grant an extension of time by which the parties must file their responses to the government's motion up to and including November 7, 2023.

Dated: October 31, 2023

Respectfully submitted,

/s/ Abbe David Lowell

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**CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)**

I, Jack W. Pirozzolo, counsel for eBay, hereby certify that, in accordance with Local Rule 7.1(a)(2), on October 30, 2023, counsel for eBay conferred with counsel for the government who stated that the government does not object to this motion. On October 30, 2023, counsel for eBay conferred with counsel for Plaintiffs who stated that Plaintiffs assent to this motion.

Dated: October 31, 2023

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2023, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants. An email copy was sent to *pro se* defendant Stephanie Stockwell.

Dated: October 31, 2023

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo